

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Arron Faulk

:

Civil Action #

3:17-CV-941

:

Jury Trial Demanded

V.

:

Doctor Frommer

**FILED
SCRANTON**

MAY 30 2017

**PER *Amy*
DEPUTY CLERK**

I. INTRODUCTION

1. This civil action filed by Arron Faulk a state prisoner for damages and injunction relief under 42 U.S.C. § 1983 alleging violations of Plaintiffs rights of adequate medical treatment.

II. JURISDICTION

2. The Court has jurisdiction over the Plaintiffs claims of violation of federal Constitutional rights under 42 U.S.C. § § 1331 (1) and 1343.

3. The Court has supplemental jurisdiction over the Plaintiffs State law tort claims under 28 U.S.C. § 1367.

III. PARTIES

4. The Plaintiff Arron Faulk is incarcerated at SCI Smithfield 1120 Pike Street Huntingdon, PA 16652.

5. Doctor Frommer at SCI Smithfield 1120 Pike Street Huntingdon, PA 16652

6. All the Defendants have acted and continue to act under color of State law at all times relevant to this Complaint.

IV. FACTS

7. Plaintiff Arron Faulk has been subjected to sever pain surgery was performed 5-25-16.

8. Plaintiff returned to SCI Smithfield from SCI Somerset were surgery, which was an invasive operation on the right knee.

9. There was no post-operation pain medication given to Plaintiff.

10. At SCI Somerset Plaintiff was given crutches and was ordered to use them but then plaintiff came back to SCI Smithfield and was ordered to turn the crutches in to medical.

11. Plaintiff questioned why medical was taking the crutches and told them about the pain and trouble walking and was told once the doctor reviews things they will be returned which they never was nor was a cane given to ambulate.

12. Plaintiff would like to state there is no problem with post-opt procedures from SCI Somerset.

13. The post-op treatment was at the hands of Doctor Frommer due to Plaintiff was in bad pain and not being able to properly walk around.

14. By plaintiff not having a cane or crutches caused plaintiff to relax the weight putting on the right knee that caused plaintiff to apply too much pressure to the left leg, causing the left leg to ache. Plaintiff requested at sick call for a cane or crutches but was refused.

15. Plaintiff points to 6-10-16 vist to Dr. Frommer when he twisted Plaintiff knee and re-in juried the knee because later that night it was bruised severely and hurt very badly.

16. Dr. Frommer failed to treat Plaintiff properly with no pain medication, no cane, and twisting Plaintiffs right knee to the point of harm, which has left plaintiff in severe pain and not being able to walk properly.

V. FACTS

17. Plaintiff has exhausted his administrative remedies with respect to all claims and all defendants.

VI. CAUSE OF ACTION

18. Plaintiff incorporates by reference paragraphs 1 thru 17 above as if fully set forth herein for all causes of action.

19. Defendants failed to use reasonable care, which subjected Plaintiff to further serious harm and failed to provide medication and cane or crutches.

RELIEF REQUESTED

Plaintiff respectfully requests that this Court enter judgment granting:

20. A declaration that defendants violated Plaintiffs rights.

21. Compensatory damages against the defendant.

22. Punitive damages against the defendant.

23. A jury trial on all triable issues.

24. Any other relief the Court deems necessary.

Respectfully Submitted

A handwritten signature in black ink, appearing to read 'Arron Faulk', is written over a horizontal line.

Arron Faulk #FM-8238

1120 Pike Street

Huntingdon, PA 16652

VERIFICATION

I Arron Faulk, hereby verify that the statement made in this action are true and correct, to the best of my knowledge. I understand that false statements herein are subject to penalties of 28 U.S.C. § 1746.

Respectfully Submitted

A handwritten signature in black ink, appearing to read 'Arron Faulk', is written over a horizontal line.

Arron Faulk #FM-8238

1120 Pike Street

Huntingdon, PA 16652

#FM8238
old
10 Pike St
PA 16652

RECEIVED
SCRANTON

MAY 30 2017

PER MA
DEPUTY CLERK

Mr. Gary J. Hollinger, Clerk
United States District Court
Middle District of Pennsylvania
P.O. Box 1148
Scranton, PA 18501-1148

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